

Brian C. Swanson (*pro hac vice*)  
brian.swanson@bartlitbeck.com  
Katherine M. Swift (*pro hac vice*)  
kate.swift@bartlitbeck.com  
BARTLIT BECK LLP  
54 West Hubbard Street  
Chicago, IL 60654  
Telephone: 312. 494.4400  
Facsimile: 312.494.4440

Alex J. Harris (*pro hac vice*)  
alex.harris@bartlitbeck.com  
Gabriel Levin (SBN 330163)  
gabe.levin@bartlitbeck.com  
BARTLIT BECK LLP  
1801 Wewatta Street, Suite 1200  
Denver, CO 80202  
Telephone: 303.592.3100  
Facsimile: 303.592.3140

*Attorneys for Defendant Walgreen Co.*  
*(Additional counsel listed on signature page)*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

CITY AND COUNTY OF SAN  
FRANCISCO, et al.,

Plaintiffs,  
vs.

PURDUE PHARMA L.P., et al.,

Defendants.

Civil Case No. 3:18-CV-07591-CRB

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED (RE:  
WALGREEN CO.'S MOTION TO  
EXCLUDE THE OPINIONS AND  
TESTIMONY OF ELIZABETH  
PARK)**

Hon. Charles R. Breyer and Hon.  
Jacqueline Scott Corley

1 Pursuant to Northern District of California Civil Local Rules 7-11 and 79-5(f),  
2 Defendant Walgreen Co. (“Walgreens”) brings this Administrative Motion to Consider  
3 Whether Another Party’s Material Should be Sealed, with respect to Exhibit A to the  
4 Declaration of Alex J. Harris in Support of Walgreen Co.’s Motion to Exclude the Opinions  
5 and Testimony of Elizabeth Park and to the Motion to Exclude itself. Exhibit A is an excerpt  
6 from the deposition transcript of Elizabeth Park and has been designated Highly Confidential  
7 Subject to the Protective Order. Walgreens’ Motion to Exclude also contains references to  
8 deposition transcript of Elizabeth Park, which has been designated Highly Confidential.

9 Walgreens has provisionally filed the aforementioned documents under seal to  
10 comply with Civ. L. R. 79-5(f) and to give the People the opportunity to argue the merits of  
11 this issue. Unredacted copies of the Motion to Exclude and supporting Exhibits are attached  
12 to this Motion.

1 DATED: February 14, 2022

Respectfully submitted,

2 /s/ Katherine M. Swift  
3 Brian C. Swanson (*pro hac vice*)  
4 brian.swanson@bartlitbeck.com  
5 Katherine M. Swift (*pro hac vice*)  
6 kate.swift@bartlitbeck.com  
7 BARTLIT BECK LLP  
8 54 West Hubbard Street  
9 Chicago, IL 60654  
10 Telephone: 312.494.4400  
11 Facsimile: 312.494.4440

Alex J. Harris (*pro hac vice*)  
alex.harris@bartlitbeck.com  
Gabriel Levin (SBN 330163)  
gabe.levin@bartlitbeck.com  
BARTLIT BECK LLP  
1801 Wewatta Street, Suite 1200  
Denver, CO 80202  
Telephone: 303.592.3100  
Facsimile: 303.592.3140

Charles J. Stevens (SBN 106981)  
cstevens@gibsondunn.com  
Joshua D. Dick (SBN 268853)  
jdick@gibsondunn.com  
Kelsey J. Helland (SBN 298888)  
khelland@gibsondunn.com  
GIBSON DUNN & CRUTCHER LLP  
555 Mission Street, Suite 3000  
San Francisco, CA 94105  
Telephone: 415.393.8200  
Facsimile: 415.393.8306

*Attorneys for Defendant WALGREEN CO.*